

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|-------------------------|
| In re: |) | Chapter 11 |
| |) | |
| LEHMAN BROTHERS HOLDINGS INC., et al., |) | Case No. 08-13555 (JMP) |
| |) | |
| Debtors. |) | Jointly Administered |
| |) | |

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Raniero D'Aversa, Jr., Courtney M. Rogers and Orrick, Herrington & Sutcliffe LLP hereby enter their appearances in the above-captioned Chapter 11 cases on behalf of Telecom Italia Capital S.A. pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Sections 342 and 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”), and request copies of all notices given or required to be given in these cases and all papers served in these cases (including, but not limited to, all papers filed and served in all adversary proceedings in these cases, and all notices mailed only to parties who filed with the court a request that all notices to be mailed to them) be given to and served upon them as follows:

ORRICK HERRINGTON & SUTCLIFFE LLP
666 Fifth Avenue
New York, NY 10103-0001
Attention: Raniero D'Aversa, Jr., Esq.
Courtney M. Rogers, Esq.
Telephone: (212) 506-5000
Facsimile: (212) 506-5151
Email: rdaversa@orrick.com
crogers@orrick.com

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only notices and papers referred to in the rules specified above, but also includes, without limitation, all orders and notice of any application, motion, order, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telecopy or otherwise, which affects the debtors or the property of the debtors.

PLEASE TAKE FURTHER NOTICE that demand is also made that the undersigned be added to the notice list for notice of all contested matters, adversary proceedings, and other proceedings in these cases.

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rule 3017, the foregoing request includes any disclosure statement and/or plan of reorganization that may be filed in this case.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not be deemed or construed to be a waiver by Telecom Italia Capital S.A.: (1) of the right to have final orders in non-core matters entered only after de novo review by a District Court Judge; (2) of the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) of the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) of any other rights, claims, actions, setoffs, or recoupments to which Telecom Italia Capital S.A. is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Telecom Italia Capital S.A. expressly reserves.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby consents to e-mail service as may be given in this case.

Dated: September 30, 2008
New York, NY

ORRICK HERRINGTON & SUTCLIFFE LLP

By:/S/ RANIERO D'AVERSA, JR.

Raniero D'Aversa, Jr. (RD-9551)
Courtney M. Rogers (CR-9906)
666 Fifth Avenue
New York, NY 10103-0001
Telephone: (212) 506-5000
Facsimile: (212) 506-5151

Attorneys for Telecom Italia Capital S.A.